The table below encompasses NASUCA's proposal that companies under the same ownership within a state would be combined for purposes of the 50,000 access line threshold and NASUCA's related proposal that rural carriers under the same ownership as non-rural carriers would be treated as non-rural. The determination of "same ownership" is based on the source material; there are likely other co-ownership situations that have been missed.

Sources: NECA USF Study Area Detail for All Exchange Carriers (Year End 12/2003);

USAC Appendix HC01 (Fourth Quarter 2004);

2004 Universal Service Monitoring Report; file "usf03r02.zip" at

http://www.fcc.gov/Bureaus/Common_Carrier/Reports/FCC-

State_Link/Monitor/index3.html

State	access	Rural carriers with 50,000 or more access lines (access lines in parentheses)		Non-rural carriers
	Study Area Code	Company		
Alabama	250298	Madison River/Gulf Tel Co-AL (57K)	24	CenturyTel ² BellSouth
Arizona	452172 454426 454449	Citizens: Frontier-Rural (102K) Frontier-Wh Mt (42K) Navajo-AZ-Frontier (22K) Total Citizens (166K)	13	Qwest
Arkansas	401691 401142 401143 401144 401705 401711 401720 401727	ALLTEL: AR (108K) CenturyTel: NW AR Russellville (113K) NW AR Siloam (22K) Central AR (83K) Arkansas (19K) Mtn Home (22K) Redfield (2K) South Arkansas (1K) Total CenturyTel (262K)	19	BellSouth

¹ Totals may not match due to rounding.

² Two study areas.

State	access	lers with 50,000 or more lines (access lines in parentheses)	Rural carriers with fewer than 50,000 access lines	Non-rural carriers
	Study Area Code	Company		
California	542308 543402 544342	Citizens: CA (132K) Golden State (16K) Tuolumne (7K) Total Citizens (155K)	14	Pacific Bell SureWest Tel Verizon ³
Colorado	462208 462185	CenturyTel: Colorado (11K) Eagle (85K) Total CenturyTel (96K)	24	Qwest
Connecticut			1	SBC
Delaware			0	Verizon
District of Columbia			0	Verizon
Florida	210336 210291 210329 210339	ALLTEL: Florida (95K) FairPoint: GTC (5K) GTC (11K) GTC (37K) Total FairPoint (53K)	5	BellSouth Verizon
Georgia	220357 223036 223037 220386 220364 220395	Sprint (2,063K) ALLTEL: ALLTEL GA Inc. (72K) GA ALLTEL (97K) ALLTEL GA Communications (334K) Standard Tel (82K) GA Tel Corp (8K) Accucomm (5K) Total ALLTEL (598K)	29	BellSouth
Idaho	472416	Verizon (132K)	17	Qwest ⁴

³ Current rural study areas would become non-rural when combined with Verizon's non-rural study area.

⁴ Current rural study area would become non-rural when combined with Qwest's non-rural study area.

State		Rural carriers with 50,000 or more access lines (access lines in parentheses)		Non-rural carriers
	Study Area Code	Company		
Illinois	Code	Citizens:	42	SBC
IIIIIOIS	341011	Lakeside (1K)	72	Verizon ⁵
	341038	Frontier of IL (5K)		VCHZOH
	341055	Midland (5K)		
	341061	Mt Pulaski (2K)		
	341067	Orion (2K)		
	341073	Prairie (1K)		
	341079	Schuyler (3K)		
	341183	Citizens Tel Co (106K)		
	340998	Depue (1K)		
		Total Citizens (126K)		
	341057	Gallatin River		
		Communications (74K)		
	341037	IL Consolidated Tel		
		(80K)		
Indiana	320832	Sprint (271K)	37	SBC Verizon ⁶
Iowa		Citizens	148	Qwest
	351127	Frontier of IA (57K)		
		ITS:		
	351167	North (117K)		
	351170	Systems (76K)		
	351178	IA Telecom (81K)		
		Total ITS (274K)		
Kansas		Sprint:	35	SBC
	411317	United of Eastern Kansas		
		(58K)		
	411842	UTC of KS (69K)		
	411957	UTC-MO (6K)		
		Total Sprint (133K)		
Kentucky			14	ALLTEL ⁷
				BellSouth
				Cincinnati
				Bell

⁵ Current rural study areas would become non-rural when combined with Verizon's non-rural study area.

 $^{^{6}}$ Current rural study areas would become non-rural when combined with Verizon's non-rural study area.

⁷ Current rural study areas would become non-rural when combined with ALLTEL's non-rural study area.

State	access	Rural carriers with 50,000 or more access lines (access lines in parentheses)		Non-rural carriers
	Study Area	Company	access lines	
Louisiana	270423 270424 270427 270431 270434 270436 270439 270440 270442	CenturyTel: Central LA (20K) SE LA (14K) Chatham (2K) NW LA (10K) Evangeline (37K) N LA (8K) Ringgold (2K) E LA (3K) SW LA (6K) Total CenturyTel (102K) FairPoint:	10	BellSouth
	100015 100004 100025 103313	Community Service (12K) China (4K) Standish (22K) Northland (26K) Total FairPoint (64K)		
Maryland			1	Verizon
Massachusetts			2	Verizon
Michigan	310702 310671 310689 310705	CenturyTel: Century of MI (60K) Midwest (29K) CenturyTel Upper MI (13K) Northern MI (3K) Total CenturyTel (105K)	32	SBC Verizon ⁸
Minnesota	361123 367123 361367	Citizens: Citizens Tel Co of MN (131K) Citizens Tel. (4K) Frontier Communications of MN (129K) Total Citizens (264K) Sprint: UTC of MN	83	Qwest
	361456	Sprint: UTC of MN (168K)		

⁸ Current rural study area would become non-rural when combined with Verizon's non-rural study area.

State	access	Rural carriers with 50,000 or more access lines (access lines in parentheses)		Non-rural carriers
	Study Area Code	Company		
Mississippi			18	BellSouth
Missouri	421885 421957	ALLTEL: MO (70K) Sprint: UTC of MO (240K)	36	CenturyTel ⁹ SBC
Montana	482249	CenturyTel: MT (64K)	16	Qwest
Nebraska	371128	Citizens: Frontier NE (53K)	37	Qwest ALLTEL
Nevada			12	Centel SBC
New Hampshire			9	Verizon
New Jersey	160138	Sprint: United Tel NJ (222K)	1	Verizon
New Mexico	491164 491193	Valor: #1 (45K) #2 (49K) Total Valor (94K)	13	Qwest
New York	150106 150109 150113	ALLTEL: Fulton (48K) Jamestown (48K) Red Jacket (3K) Total ALLTEL (99K)	31	Citizens ¹⁰ Verizon
North Carolina	230476	ALLTEL: Carolina N (233K)	18	BellSouth North State Verizon ¹¹
	230474 230470 230471	Concord Tel Co (117K) Sprint: Carolina T& T (1,139K) Central of NC (262K) Total Sprint (1,401K)		

⁹ Current rural study areas would become non-rural when combined with CenturyTel's non-rural study areas.

 $^{^{10}}$ Current rural study areas would become non-rural when combined with Frontier's non-rural study area.

¹¹ Two study areas.

State	access	Rural carriers with 50,000 or more access lines (access lines in parentheses)		Non-rural carriers
	Study Area Code	Company		
North Dakota			22	Qwest
Ohio	300630	CenturyTel: OH (82K) Sprint:	35	ALLTEL ¹² Cincinnati Bell SBC
	300661	UTC of OH (588K)		Verizon
Oklahoma	432018	Pioneer Tel Co-op (54K)	37	SBC
	431165	Valor: OK (115K)	20	
Oregon	532361	CenturyTel: Eastern OR (75K)	28	Qwest Verizon
	532400	Sprint: UTC of the NW - OR (72K)		
Pennsylvania	170176	ALLTEL: PA (235K)	25	Verizon ¹³
	170161	Commonwealth Tel (339K)		
	170151 170162 170165	D&E: Buffalo Valley (23K) Conestoga (61K) Denver & Ephrata (61K) Total D&E (145K)		
	170193	North Pittsburgh Telephone (77K)		
	170209	Sprint: UTC of PA (385K)		
Rhode Island			0	Verizon

 12 Current Western Reserve rural study area would become non-rural when combined with ALLTEL's non-rural study area.

¹³ Current rural study areas would become non-rural when combined with Verizon's other study area.

State	access	ders with 50,000 or more lines (access lines in parentheses)	Rural carriers with fewer than 50,000	Non-rural carriers
	Study Area Code	Company	access lines	
South Carolina	240517	ALLTEL: SC (60K)	12	BellSouth
	240520	Farmers Telephone (60K)		Verizon ¹⁴
	240512 240523	Low Country: Bluffton (20K) Hargray (55K) Total Low Country (75K)		
	240528	Horry Telephone Co-op (94K)		
	240521 240527 240531 240542 240539 240506	Rock Hill: Fort Mill (22K) Home (23K) Lancaster (27K) Rock Hill (55K) PBT Telecom. (17K) Total Rock Hill (144K) Sprint: UTC of the Carolinas (97K)		
South Dakota			29	Qwest
Tennessee	294336 290580	Citizens: Frontier TN (74K) Volunteer State (22K) Total Citizens (96K)	17	BellSouth
	290567	Sprint: United Intermountain (247K)		
	290566 290575 290578 290559	TDS: Humphrey's (2K) TN Tel (67K) Tellico (10K) Concord (24K) Total TDS (103K)		

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 $^{^{14}}$ Current rural study area would become non-rural when combined with Verizon's non-rural study area.

State	access	iers with 50,000 or more lines (access lines in parentheses)	Rural carriers with fewer than 50,000 access lines	Non-rural carriers
	Study Area Code	Company		
Texas	442147 442153	ALLTEL: Sugar Land Tel (80K) TX (33K) Total ALLTEL (113K)	47	SBC Verizon ¹⁵
	442114 442084	Sprint: Centel of TX (220K) UTC of TX (164K) Total Sprint (384K)		
	442072 442109	TXU: Fort Bend (44K) TXU (120K) Total TXU (164K)		
	442097 441163	Valor: Kerrville (27K) TX (313K) Total Valor (340K)		
Utah			12	Qwset
Vermont Virginia	190254 190567	Sprint: Centel of VA (293K) United Intermountain (105K) Total Sprint (398K)	9 16	Verizon Verizon ¹⁶
Washington	522408 522410	CenturyTel: WA (182K) Cowiche (2K) Total CenturyTel (184K)	18	Qwest Verizon ¹⁷
	522400	Sprint: UTC of the NW (83K)		

¹⁵ Two study areas.

¹⁶ Current rural study area would become non-rural when combined with Verizon's two non-rural study area.

¹⁷ Two study areas.

State	Rural carriers with 50,000 or more access lines (access lines in parentheses)		Rural carriers with fewer than 50,000 access lines	Non-rural carriers
	Study Area Code	Company		
West Virginia	200271 204338 204339	Citizens: Frontier WV (26K) (37K) (94K) Total Citizens (157K)	6	Verizon
Wisconsin	330841 330857 330877 330884 330895 330898 330913 330922 330924 330934 330950 330959 330970 331155 330956 331159 330891 330891 330891 330940 330941	CenturyTel: MW-WI Cencom (29K) MW-WI Casco (1K) Fairwater (1K) Forestville (2K) WI (58K) Larsen (3K) Monroe (12K) MW WI-NW (86K) Kendall (87K) So WI (7K) MW-WI Platteville (10K) NW WI (20K) Thorp (2K) Wayside (7K) Tel USA of WI (58K) North WI (14) Central WI (68K) Total CenturyTel (465K) Citizens: Rhinelander - Rib Lake (15K) Rhinelander - Crandon (4K) Rhinelander - Rib Lake (1K) Mondovi (3K) WI (27K) St. Croix (10K) Viroqua (4K) Total Citizens (70K)	44	SBC Verizon

State	Rural carriers with 50,000 or more access lines (access lines in parentheses)		Rural carriers with fewer than 50,000 access lines	Non-rural carriers
	Study Area	Company		
	Code			
Wisconsin (con't)		TDS:		
	330844	Badger (7K)		
	330851	Bonduel (2K)		
	330849	Black Earth (2K)		
	330859	Central State (11K)		
	330909	Midway (9K)		
	330914	Eastcoast (7K)		
	330917	Mt. Vernon (14K)		
	330945	Scandinavia (3K)		
	330963	Utelco (17K)		
	330968	Waunakee (8K)		
	330930	Grantland (4K)		
	330943	Riverside (4K)		
	330952	SE Tel (11K)		
	330954	Stockbridge (4K)		
	330958	Tenney (1K)		
	330856	Burlington (4K)		
	330875	Dickeyville (1K)		
	330880	Farmers (7K)		
	330881	Mid-Plains (36K)		
		Total TDS (152K)		
Wyoming			9	Qwest